

TEMPLATE FOR AUTHORIZED STATES  
NPDES Annual CMS Plan and EOY Report for Minnesota

National NPDES CMS Metric	National Compliance Monitoring Goal	Minnesota NPDES CMS Plan for 2015						Minnesota End of Year Report				
		Universe of Facilities	Approved State Commitment		Combined EPA/State Commitment	% of Universe Covered	Brief Explanation of Flexibilities Utilized	Completed Activities		% of Universe Covered	% Change from Commitment (specify +/-)	Brief Explanation of Change
			# of activity	activity type				# of facilities	activity type			
1.A: Major Facilities – Traditional Approach	At least one comprehensive inspection of all majors every two years											
1.A: Major Facilities – Alternative Approach for Eligible Facilities	At least one comprehensive inspection every three years for facilities designated for modified frequency by ITM	98	41	CEI		41%	In FY15 MN is up to near normal in inspector resources, but has 4-5 FTEs that are less than 12 months into the program. The MPCA will conduct 41 Majors in FY15. These majors were selected using the Inspection Targeting Model with ICIS data and updated inspections from State data.	41	CEI	41%	0%	
1.A Totals			41		0			41		0.41		
1.B.1: Traditional non-major – non-impaired waters	At least one inspection every five years. Comprehensive inspections for at least 5% of universe.	1018 total combined 1.B.1 and 1.B.2	204 or 20% see text at right for breakdown	CEI/DSA* (*for 50-75 sites).		20%	MPCA NPDES/SDS WQ traditional non majors (minors) inspection plan, covering both 1.B.1. and 1.B.2. Goal is to inspect approximately 204 facilities. Sites will be selected from the universe of traditional non majors. Selection will be completed using a combination of reports, risked-based approach of facility discharge types, the length of time between site inspections, and in conjunction with their proximity and contribution (or lack of) to waters with 303 (d) impairments or sensitive watersheds. Approximately 5-7% (approx 50-75) of the inspections in 1.B.1 will be conducted using the DSA type inspections in conjunction with the reports/methods above. Any sites in 1.B.1 or 1.B.2 that have This exceeds the National CMS minimum commitment for PAIs based on MN's Universe. 20% of the univers = 2.8 PAIs.	234	CEI/Recon	19%	-1%	A total of 250 minors were covered. 1% is an estimated value due to resources committed to Tempo database. Of the 250 it is unknown if 204 (as committed) were NPDES only. Total is a mixture of both NPDES and SDS.
1.B.2: Traditional non-major – impaired waters	At least one comprehensive inspection every five years.	1018 total combined 1.B.1 and 1.B.2	204 or 20% see text at right for breakdown			20%		16 in addition to the 234 above	10 complaints, 4 ORRs, 2 Enf. follow-up			
1.C.1: Pretreatment program audits	At least one audit every five years.	14	3	PAIs				3	PAI	20%	0%	
1.C.2: Pretreatment program inspections	At least two PCIs every five years.	14	2	PCIs			This is one PCI less than required per the CMS (2 every 5 years with MN's Universe) Minnesota will try to meet the requirements of in FY15, however is currently strapped for resources due to reassignments of staff to develop, test and train programs in new agency-wide data base called Tempo 360.	4	PCI	0%	0%	conducted twice as many but there is not % commitment for PCIs on an annual basis
1.C.3: Pretreatment - SIUs discharging to POTWs w/out approved pretreatment program	Inspect and sample all SIUs annually.	26	see notes far right				No flexibilities/deviations because this is a regulatory requirement (see 40 CFR 403.8(f)(2)). See MPCA note at far right.	5	CEI/Recon	20%	-80%	Minnesota will try to meet the requirements of 40CFR403 in FY15, however is currently strapped for resources due to reassignments of staff to develop, test and train programs in new agency-wide data base called Tempo 360. Cannot meet goal due to Tempo 360 testing efforts (e-dmr) greater than projected)
1.D: Sewage Sludge/Biosolids (Generation, Use and Disposal Sites)	At least one inspection or off-site desk audit every five years.	283 total; 65 majors w/ land app 85 minors w/ land app	2 Majors, 6 Minors				Minnesota is not a delegated 503 program but continues to inspect Majors and Minors with land application each year.	7	BCI	11%	100%	7 majors were conducted in stead of 2 majors and 6 minors in FY15
2.A: Combined sewer systems (CSS)- Major and non-major	At least one CSO inspection every five years.	1	0					n/a				
2.B: Sanitary Sewer Systems	Inspect at least 5% of universe of permitted POTWs with SSS annually or more frequently, if needed, to evaluate all recurring SSOs.	427	22	CEI		5%	Minnesota evaluates collection systems, data and corrective actions for violations through normal CEI inspections of NPDES facilities.	177	CEI	41%	(+)-36%	exceeding goal
2.C.1: MS4 – Phase I and Phase II	One audit, MS4 inspection or off-site desk audit of entire universe at least every five years, with onsite audit or inspection at least every seven years.	235	33	MS4 Audits/Inspections		14%	MPCA will conduct on-site inspections/audits of entire universe over 7-year period. There are no desk audits planned.	33	MS4 Audits/Inspections	14%	0%	
2.C.2: Industrial stormwater	Inspect at least 10% of the universe each year.	1452 permits 2130 N.E.. Total 3582	75 (see text at right)			5%	Goal is 5% inspections coverage at facilities (universe 1500) or approximately 75 inspections (inspection resource FTE 2.0), plus real-time monitoring off all facilities through review of quarterly monitoring data. All ISW facilities in Minnesota are required to conduct 'benchmark monitoring' of industry-related parameters for 4 consecutive quarters, giving MPCA a degree of 'real-time' information on all ISW facilities and the opportunity to identify facilities having trouble meeting benchmarks. State then determines appropriate response, ranging from outreach, compliance assistance, site inspection, or need for enforcement. Sites that might contribute to 303 (d) watersheds will be comprehensive inspections. To conserve FTE resources, municipal or industrial majors and minors that have an ISW component will be inspected and counted in conjunction with either 1.B.1. or 1.B.2.	98	CEI/ORR	7%	2%	

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2.C.3: Construction stormwater sites (one acre or larger)	Inspect at least 10% of the universe each year.	3346 active 1673 apps/yr	334	Stormwater Inspection		10%	1673 permits/year; open for 2 years on average=3346 active; also piloting coordinating project with regulated MS4s.	313	ConstructionS tormwater Inspections	91%	-6%	CMS goals were not met due to: 1) loss of resources to TEMPO database development, 2) loss of 2 program FTE's, 3) significant staff turnover in the CSW program, and 4) development and implementation of a continuous improvement project focused on relationship building with local CSW programs within regulated MS4s.
2.D.1: Large and medium permitted CAFOs	At least one inspection every five years.	1364	205		0	15%	State commitment is 75% of 1/5 of the Universe. This reduction is due to resources lost from the MPCA's C&E database replacement project. This committment will be satisfied with traditional comprehensive inspections and a limited number of focused inspections of application of manure on frozen or snow covered soils.	237 Traditional, 4 Focused	Trad. Inspection / Focused Inspection	17.6%	+2%	
2.D.2: Large unpermitted CAFOs	Inspect each unpermitted CAFO at least once to determine if permit is required.	0			0		all large CAFOs are permitted. Large CAFOs are inspected once every five years.					
2.D.3: Medium AFOs	Assess all medium-sized AFOs to determine if facility is a CAFO or should be designated.	0			0		AFOs with the potential to be defined or designated as a medium CAFO are inspected due to complaints and on a routine basis by delegated county feedlot staff and on an as needed basis by MPCA staff. If a discharge is identified, the discharge must be eliminated.					
2.D.4: Small AFOs	Inspect as needed.	0			0		AFOs with the potential to be designated as a small CAFO are inspected due to complaints or on an as needed basis. All feedlots with 50 or more animal units outside of shoreland, or 10 or more animal units in shoreland must be registered with the state.					
3.A: Pesticides	Inspect as needed.						MN pesticide program will utilize a complaint and tip component. It also will include coordination with MN DNR and Dept of Agriculture in applicator management pursuant to the SDS Permit.					
3.B: Vessels	Inspect as needed.						MN Ballast water permit program will utilize a complaint and tip component. It also will include a review of ballast water management plans pursuant to the SDS Permit. There is no added program support for these CMS commitments and resouirces will draw from traditonal NPDES/SDS program areas					

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			# of activity	activity type				# of facilities	activity type			
1.A: Major Facilities – Traditional Approach	At least one comprehensive inspection of all majors every two years											
1.A: Major Facilities – Alternative Approach for Eligible Facilities	At least one comprehensive inspection every three years for facilities designated for modified frequency by ITM	98	41	CEI		41%	In FY15 MN is up to normal in inspector resources, but has 4-5 FTEs that are less than 12 months into the program. The MPCA will conduct 41 Majors in FY15. These majors were selected using the ICIS data and updated inspections. This is 41% of the universe. (EPA: are you using targeting model? If so please state.)					
1.A Totals			41		0			0		0		
1.B.1: Traditional non-major – non-impaired waters	At least one inspection every five years. Comprehensive inspections for at least 5% of universe.	1018 (total)	204 (20%)				MPCA NPDES/SDS WO traditional non majors (minors) inspection plan, covering both 1.B.1. and 1.B.2. Goal is approximately 204 inspections. Sites will be selected from the universe of traditional non majors. Selection will be completed using reports, a risked based approach of facility discharge types, the length of time between site inspections and, lastly in conjunction with their proximity and contribution (or lack of) to waters with 303 (d) impairments or sensitive watersheds. Approximately 5-7% (approx 50-75) of the inspections will be conducted using the DIA type inspections in conjunction with the reports/methods above. This subset will not include contributing facilities. Any sites that have an industrial stormwater component will be inspected and counted under 2.C.2.					
1.B.2: Traditional non-major – impaired waters	At least one comprehensive inspection every five years.											
1.C.1: Pretreatment program audits	At least one audit every five years.	14	3	PAI			Paul and Jeramie - you did great job explaining the recent significant increase in your state PT program universe, and that auditing these newer programs is not appropriate yet. Please state that here.					
1.C.2: Pretreatment program inspections	At least two PCIs every five years.	14	2				If this commitment is related to the explanation you provided in 1.C.1, then please state that.					
1.C.3: Pretreatment - SIUs discharging to POTWs w/out approved pretreatment program	Inspect and sample all SIUs annually.	26	see notes				Minnesota will try to meet the requirements of 40CFR403 in FY15, however is curently strapped for resources due to reassignments of staff to develop, test and train programs in new agency-wide data base called Tempo 360.					
1.D: Sewage Sludge/Biosolids (Generation, Use and Disposal Sites)	At least one inspection or off-site desk audit every five years.	283 total; 65 majors w/ land app 85 minors w/ land app	2 Majors 6 minors				Minnesota is not a delegated 503 program but continues to inspect Majors and Minors with land application each year.					
1.E: Oversight	Regional discretion; should include some activity in each state each year						To Be Determined after consultations between Region and MPCA staff					
2.A: Combined sewer systems (CSS)- Major and Non-major	At least one CSO inspection every five years.	1	0									
2.B: Sanitary Sewer Systems	Inspect at least 5% of universe of permitted POTWs with SSS annually or more frequently, if needed, to evaluate all recurring SSOs.	427	22	CEI			Minnesota evaluates collection systems, data and corrective actions for violations through normal CEI inspections of NPDES facilities.					
2.C.1: MS4 – Phase I and Phase II	One audit, MS4 inspection or off-site desk audit of entire universe at least every five years, with onsite audit or inspection at least every seven years.	235	33				This is almost 1/7 years (33 X 7 =231). Is state planning any off-site desk audits? See page 14 of 2014 CMS					
2.C.2: Industrial stormwater	Inspect at least 10% of the universe each year.	1452 permits 2130 N.E.. Total 3582	75			5%	Goal is for 5% of facilities (universe 1500) or approximately 75 inspections (inspection resource FTE 2.0). All (100 %) of ISW facilities in Minnesota are required to monitor stormwater for a host of related industry related parameters. In order for the sites to cease monitoring 4 quarters' averages must meet the benchmark. Reporting of monitoring and updating of stormwater plans are required pursuant to the MPCA ISW general permit. A subset of sites that might contribute to 303 (d) watersheds will be comprehensive inspections. To conserve FTE resources, any sites that have an industrial wastewater component will be inspected and counted in conjunction with either 1.B.1. and 1.B.2..					
2.C.3: Construction stormwater sites (one acre or larger)	Inspect at least 10% of the universe each year.											
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